

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DIRECT SOURCE SEAFOOD LLC, a
Washington limited liability company,

Plaintiff,

v.

AQUA STAR (USA) CORP., a Washington
corporation; and DOES 1-20, inclusive,

Defendants.

Case No. 2:16-cv-00407-RSL

STIPULATION AND ~~PROPOSED~~ ORDER
OF DISMISSAL

NOTE ON MOTION CALENDAR:
March 24, 2017

Plaintiff Direct Source Seafood LLC (“DSS”) and Defendant Aqua Star (USA) Corp.
 (“Aqua Star”) hereby stipulate as follows:

1. DSS filed its Complaint in this action on March 18, 2016, asserting federal and
state law claims relating to Aqua Star’s use of DSS’s CHEF’S NET trademarks. (See Dkt. 1.)
Aqua Star filed its Answer to DSS’s Complaint on April 13, 2016, in which it also asserted a
counterclaim for declaratory relief regarding the validity of DSS’s CHEF’S NET trademarks.
(See Dkt. 19.)

2. The parties have agreed to entry of the [Proposed] Permanent Injunction Against
Defendant Aqua Star (USA) Corp. in the form attached to the parties’ Stipulation for Entry of
Permanent Injunction Against Defendant Aqua Star (USA) Corp. and Stipulated Dismissal.

3. The parties have further agreed that, upon entry of the [Proposed] Permanent
Injunction Against Defendant Aqua Star (USA) Corp. by the Court, this action—including all

claims and counterclaims asserted therein—shall be dismissed with prejudice and without costs to either party.

SO STIPULATED TO AND AGREED BY:

Dated: March 24, 2017

FOCAL PLLC

By: s/ Venkat Balasubramani

s/ Stacia N. Lay

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Dated: March 24, 2017

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Attorneys for Defendant

1 claims and counterclaims asserted therein—shall be dismissed with prejudice and without costs
2 to either party.

3 SO STIPULATED TO AND AGREED BY:

4 Dated: March __, 2017

FOCAL PLLC

5 By: s/

6 s/

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25 Attorneys for Defendant

ORDER

Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED THAT:

1. Having entered the Permanent Injunction Against Defendant Aqua Star (USA) Corp. pursuant to the parties' stipulation for Entry of Permanent Injunction Against Defendant Aqua Star (USA) Corp. and Stipulated Dismissal, this action—including all claims and counterclaims asserted therein—be dismissed with prejudice.

2. The parties shall bear their own attorneys' fees and costs.

IT IS SO ORDERED.

DATED this 28th day of March, 2017.



Robert S. Lasnik
United States District Judge